

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

!	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
N/A	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
U	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

This Report Form consists of the following sections:

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Reporting Year 2010-2011

I. Program Management

- A. Permittee Name: City of Downey, California
- B. Permittee Program Supervisor: Gerald E. Greene
 Title: **Principal Civil Engineer, Water Resources Control Specialist**
 Address: **11111 Brookshire Avenue**
 City: : **Downey** Zip Code: **90241-7016**
 Phone: **562-904-7112** Fax: **562-904-7296**
- C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The City of Downey Municipal Separate Storm Sewer System (MS4) Program is coordinated through the Engineering Division of the Department of Public Works. The Engineering Division developed a scheme for sharing MS4 Permit responsibilities among city divisions including Code Enforcement Unit, Fire Prevention Bureau, Utilities Division, Maintenance Services Division, Planning, and Building and Safety. Any questions or deviations from this scheme were to be shared with the Stormwater Coordinator in Engineering Division. The Community Development Department remains responsible for Permit compliance at the Downey Studios and Kaiser Hospital Redevelopment project areas.

TABLE 1 - Program Management

Storm Water Management Activity	Division/Department	# of Individuals Responsible for Implementing
1. Outreach & Education	Administration/Public Works	1 (CR)
2. Industrial/Commercial Inspections	Engineering/Public Works	1 (MK)
3. Construction Permits/Inspections	Engineering/PW and B&S	2 (MK & ML)
4. IC/ID Inspections	Utilities & Eng./Public Works	1 (TG)
5. Street sweeping	Utilities/Public Works	1 (TG)
6. Catch Basin Cleaning	Utilities/Public Works	1 (TG)
7. Spill Response	Utilities/Public Works & Fire	2 (TG, LS)
8. Development Planning (project/SUSMP review and approval)	Engineering/Public Works	1 (GG)+ 1(LH/JP @ Kaiser/Studios)
9. Trash Collection	Maintenance/Public Works	2 (LS & KS)

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D. Staff and Training

Attach a summary of staff training over the last fiscal year. This shall include the staff name, department, type of training, and date of training.

Due to the anticipated adoption of a new MS4P, limited staff training was undertaken during the 2010-11 period. Louis Atwell, Gerry Greene & Mark Korando attended QSP/D training. Gerry Greene was certified as a QSP/D.

E. Budget Summary

1. Does your municipality have a storm water utility? Yes ☐ No ☒

If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

The City of Downey implements MS4 Permit, stormwater, urban runoff, and water quality management associated activities and improvements from the City of Downey General Fund, Federal Grants, and State Grants.

The primary revenue sources for the City of Downey General Fund are sales taxes, property taxes, other taxes, intergovernmental revenues, service fees, interest, rent, permits and fines.

2. Are the existing financial resources sufficient to accomplish all required activities? Yes ☐ No ☒

3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.

4. List any additional state/federally funded projects related to storm water.

In the fall of 2009, the Gateway Region Integrated Region Water Management Joint Powers Authority (GR IRWM JPA) received a \$13M loan from the SRF to install CPS and ARS BMPs in Los Angeles River Catchbasins for 13 GR cities including the City of Downey. The project is nearing completion.

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TABLE 2

Program Element	Expenditures in Previous Fiscal Year	Estimated Amount Needed to implement Order 01-182
1. Program management		
a. Administrative costs	\$109,488.51	\$96,269.59
b. Capital costs	\$0.00	\$0.00
2. Public Information and Participation		
a. Public Outreach/Education	\$43,149.73	\$43,318.11
b. Employee Training	\$8,652.84	\$8,748.96
c. Corporate Outreach	\$0.00	\$2,306.80
d. Business Assistance	\$4,106.02	\$4,363.60
3. Industrial/Commercial inspection/site visit activities	\$10,765.06	\$20,284.01
4. Development Planning	\$42,321.42	\$42,530.32
5. Development Construction		
a. Construction inspections	\$35,528.93	\$37,275.60
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	\$101,873.32	\$77,831.62
b. Municipal street sweeping	\$475,726.74	\$569,272.63
c. Catch basin cleaning	\$10,314.92	\$10,229.85
d. Trash collection/recycling	\$97,500.58	\$84,504.63
e. Capital costs	\$0.00	\$0.00
f. Other	\$7,501.65	\$7,515.49
7. IC/ID Program		
a. Operations and Maintenance	\$29,837.40	\$28,539.32
b. Capitol Costs	\$0.00	\$470.00
8. Monitoring	\$55,991.73	\$71,136.02
9. Other	\$61,560.43	\$90,700.00
10. TOTAL	\$1,094,319.30	\$1,195,296.54

List any supplemental dedicated budgets for the above categories:

No supplemental dedicated budgets are available to the program at this time. Estimated budget amount are subject to change resulting from TMDL implementation costs, future permits conditions, TMDL MOAs, and transfers from the State. To the extent that litigation or alternate implementation strategies develop, the estimated budget may be dramatically reduced or increased.

List any activities that have been contracted out to consultants/other agencies:

Street Sweeping is contracted out to Nationwide Environmental Services. Calmet Sanitation assists with some aspects of trash collection at some city facilities. Vector Control is performed by the Greater Los Angeles County Vector Control District. Stormwater related Construction and Building Plan Checks were contracted to Interwest Inc. for at least a portion of this reporting period.

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II. Receiving Water Limitations (Part 2)

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes ☐ No ☒
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes ☐ No ☒
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources;
 2. A plan to comply with the RWL (Permit, Part 2);
 3. Changes to the SQMP to eliminate water quality exceedances;
 4. Enhanced monitoring to demonstrate compliance; and
 5. Results of implementation.

III. SQMP Implementation (Part 3)

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes ☒ No ☐
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes ☐ No ☒
- C. Describe the status of developing a local SQMP in the box below.

The City of Downey uses the Los Angeles County SQMP, but limits the use of treatment (flow based) BMPs. The City instead favors infiltration (volumetric) BMPs. This approach does not replace the County SQMP, but is a limitation that some developers, designers and contractors regard as a more restrictive control than those that are allowed in the LA County SQMP or the MS4 Permit.

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- D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, that your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

The City of Downey had implemented an infiltration program for redevelopment projects of 400 Square Feet, or larger. This effort is recorded in a GIS based BMP record systems that should complement the propose Los Angeles County Flood Control District Watershed Management Modeling System and facilitate source control for future watershed specific TMDLs and Pollutants of Concern.

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? **San Gabriel River**
2. Who is your designated representative to the WMC? **Gerald Greene**
3. How many WMC meetings did you participate in last year? **4 San Gabriel River WMC and 4 Los Angeles River WMC Meetings**
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

The WMCs are forums for exchanging ideas and discussing issues with other Permittees. Downey has taken a leadership role by offering our experience with infiltration projects and source control challenges. We brought back information to the WMC from other committees and workshops which our staff participates in, such as the Los Angeles and San Gabriel River Regional Monitoring, Los Angeles River Metals Technical and Steering Committees, Los Cerritos Channel, and the EAC.

5. Attach any comments or suggestions regarding your WMC.
Regional Board Staff should frequently attend WMC meetings and provide guidance on MS4 permit and TMDL implementation.

F. Storm Water Ordinance

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes ☒ No ☐
If not, describe the status of adopting such an ordinance.

N/A

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2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes ☒ No ☐
If not, please attach a copy to this Report. **N/A**
3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes ☐ No ☒
If yes, attach a copy of amendments to this Report. **N/A**

G. Discharge Prohibitions

1. List any non-storm water discharges you feel should be further regulated:

The State and Regional Boards should use the General Industrial Activities Stormwater Permit (GIASP) monitoring reports to track bad actor discharges and set pollutant control goals for 303(d) listed/TMDL/consent decree listed pollutants. This might greatly eliminate cascading pollutant discharges into the MS4.

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

Potable production wells should be allowed to discharge with settling (for sediment) BMPs. Runoff water that is actively being collected in the MS4 by a discharger (e.g. a power washer at a car lot or building that also is vacuuming up the water), should not be prohibited, since they are removing pollutants that might otherwise be washed off and discharged during a rainstorm. The Board should issue a blanket exception for non-profit (charity and residential) car washes, since it is impossible to determine whether they convey contaminants to receiving waters. Each car is different and cities cannot control the amount of foam used.

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IV. Special Provisions (Part 4)

A. Public Information and Participation (Part 4.B)

In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

1. No Dumping Message

a) How many storm drain inlets does your agency own? **>90**

b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? **0**

c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? **>90**

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

The numbers are equal. The major challenge remains distinguishing and resolving agency ownership.

d) How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? **Principal Permittee Task**

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

The Los Angeles County Department of Public Works has indicated that they marked all access points to the Rio Hondo and San Gabriel Rivers. There are no access points from Downey to the Los Angeles River or Los Cerritos Channel.

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2. Reporting Hotline

- a) Has your agency established its own hotline for reporting and for general storm water management information? Yes ☒ No ☐
- b) If so, what is the number? **The business hours reporting number is 562-904-7202. After hours water emergencies are reported to 562-904-7313, which is answered by Fire Dispatch and subsequently reported to city emergency utility staff.**
- c) Is this information listed in the government pages of the telephone book? Yes ☒ No ☐
- d) If no, is your agency coordinated with the countywide hotline? Yes ☒ No ☐
- e) Do you keep record of the number of calls received and how they were responded to? Yes ☒ No ☐
- f) How many calls were received in the last fiscal year? **See below**
- g) Describe the process used to respond to hotline calls.

There is no one path or issue, so there is no one response process. Emergency calls can be placed 24 hours a day to the Police or Fire Departments. During business hours and depending on the complaint, issues may be reported to Public Works or Code Enforcement. This includes large item pick up numbers, debris in public right of way clean up numbers, and general service requests. The City of Downey has also instituted a Non-emergency Service Request System that can be accessed from the City web site at: www.downeyca.org or City staff can input information taken by telephone. During the 7/1/10 to 6/30/11 period, 1187 digital Service Requests were taken, including 0 related to drainage water quality issues.

- h) Have you provided the Principal Permittee with your current reporting contact information? Yes ☒ No ☐
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the www.888CleanLA.com web site (Principal Permittee only)? Yes ☒ No ☐

If not, when is this scheduled to occur? **This was completed in 2002. See www.dpw.lacounty.gov/PRG/StormWater/Page_03_cf1.cfm. As the EAC and SGRWMAC Chair, the City of Downey frequently reminds new Stormwater Coordinators to update the information for their City through the County.**

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3. Outreach and Education

- a) Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation.
(Principal Permittee only)

This is a Principal Permittee task

- b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes ☒ No ☐
How many Public Outreach Strategy meetings did your agency participate in last year? 4
Explain why your agency did not attend any or all of the organized meetings.

City of Downey staff attended 4 of the 4 PIPP meetings and the 12/7/10 Annual NPDES Advisory Committee Meeting.

Identify specific improvements to your storm water education program as a result of these meetings:

The City of Downey hopes to incorporate the Restaurant Staff Educational DVD contemplated by Los Angeles County.

List suggestions to increase the usefulness of quarterly meetings:

State and non-governmental organizations could present data on cost-effective BMPs that have been demonstrated to result in a discharge water quality that meet TMDL and California Toxics Rule (CTR) numeric standards and can be installed and easily maintained by local residents in highly urbanized settings.

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented (Principal Permittee only).

The Principal Permittee coordinates and undertook this task

- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? **This is difficult to quantify, but the City of Downey's "One Person Trash" quarterly newsletter has a circulation of 35,000, so assuming 3 readers per location, we can estimate a circulation of 400,000/year.**
- d) Describe efforts your agency made to educate local schools on storm water pollution.

Held 13 Storm Water Pollution Prevention presentations for students participating in the DUSD/ASPIRE after school program ~ reached 900 students.

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- e) Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)? Yes ☐ No ☒
If not, explain why.

This is a Principal Permittee Task which the City of Downey staff cannot assess.

- f) Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).

This is a Principal Permittee Task which the City of Downey staff cannot assess.

For Permit Years 2-5, attach an assessment of the effectiveness of in-school storm water education programs.

- g) What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?

This is a Principal Permittee Task which the City of Downey staff cannot assess.

If no target has been developed, explain why and describe the status of developing a target.

This is a Principal Permittee Task which the City of Downey staff cannot assess.

What is the status of meeting the target by the end of Year 5?

This is a Principal Permittee Task which the City of Downey staff cannot assess.

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4. Pollutant-Specific Outreach

- a) Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included.
- b) Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes ☒ No ☐
- c) Did your agency help distribute pollutant-specific materials in your city? Yes ☒ No ☐
- d) Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

The City of Downey staff convey appropriate pollution specific outreach materials through emails and public notices. Our Keep Downey Beautiful Program (KDB), hosted 18 events with 1,032 participants, coordinated an Inland Heal The Bay Coastal Cleanup, and coordinated 19 adopt a street events, collecting in total about 8 tons of trash and litter. KDB also participated at the City Environmental Faire (1,500 guests), Street Fair, Used Oil Recycling Program, Hazardous Materials Roundup and the yearly Car Show and Toy Collection Drive, where attendees may receive various pollution prevention related gifts.

5. Businesses Program

- a) Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (*Principal Permittee only*).

This is a Principal Permittee Task.

- b) How many corporate managers did your agency (*Principal Permittee only*) reach last year? **This is a Principal Permittee Task.**
- c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)? **This is a Principal Permittee Task.**
- d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (*Principal Permittee only*)? Yes ☐ No ☒
If not, describe measures that will be taken to fully implement this requirement.

This is a Principal Permittee Task which the City of Downey staff cannot assess

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- e) Has your agency developed and/or implemented a Business Assistance Program? Yes ☒ No ☐

If so, briefly describe your agency's program, including the number of businesses assisted, the type of assistance, and an assessment of the program's effectiveness.

The City of Downey has focused its Business Assistance program on the Development Phase for SUSMP projects and meeting our restrictive infiltration goals in innovative ways.

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes ☒ No ☐

How many media outlets were contacted? **1**

Which newspapers or radio stations ran them?

Downey Patriot

Who was the audience?

Local Residents and Businesses.

7. Did you supplement the County's media purchase by funding additional media buys? Yes ☐ No ☒

Estimated dollar value/in-kind contribution: **0**

Type of media purchased: **N/A**

Frequency of the buys: **N/A**

Did another agency help with the purchase? Yes ☐ No ☒

8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes ☒ No ☐

If so, describe the type of advertising.

The City of Downey continues to identify and utilize non-traditional advertising opportunities, such as the quarterly newsletter mailer "One Person's Trash" which is dedicated to waste reduction, pollution control and similar environmental themes and mailed to 35,500 addresses in the city.

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes ☐ No ☒

Describe the materials that were distributed:

Developed 19 (representing 11 streets) Adopt-a-street clean ups which collected trash from the City of Downey during the 2010/11 Fiscal Year.

Who were the key partners? **City of Downey residents & businesses.**

Who was the audience (businesses, schools, etc.)?

City of Downey residents & businesses.

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10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes ☒ No ☐
How many events did you attend? **3**
11. Does your agency have a website that provides storm water pollution prevention information? Yes ☐ No ☒
If so, what is the address? **N/A**
12. Has awareness increased in your community regarding storm water pollution? Yes ☒ No ☐
Do you feel that behaviors have changed? Yes ☒ No ☐
Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

More people are asking questions relating urban stormwater pollution to the rivers and oceans.

13. How would you modify the storm water public education program to improve it on the City or County level?

Have the LARWQCB acknowledge that local agencies are installing effective BMPs and their costs. Encourage continued Low Impact Development installation by acknowledging that it is a Maximum Extent Practicable (MEP) and compliant with the Receiving Water Limitations iterative process.

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B. Industrial/Commercial Facilities Program

1. Critical Source Inventory Database

Did you (individually or jointly) update the Database for Critical Sources Inventory? Yes ☒ No ☐

Comments/Explanation/Conclusion: **The City of Downey Public Works Department continues to work with the Cashiers Division to QA the City Business License database. On March 17, 2011, the database consisted of about 4,130 records, of which 3,158 are in the city of Downey. About 336 of these NAICS codes convert to Critical Source SIC Codes and about 236 convert to GIASP SIC Codes (many are inaccurately placed in these codes). While the SWRCB (filed dated 6/24/11) shows 24 active and 5 terminated GIASP enrollees.**

2. Inspection Program

Provide the reporting data as suggested in the following tables.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Landfills	1 (Site is now a park)	0	0	0
TSDf	0	0	0	0

Comments/Explanation/Conclusion: **There are no active landfills or TSDf in the city of Downey**

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
...	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments/Explanation/Conclusion: **There are no active landfills in the City of Downey. The one inactive landfill is now a municipal park and unsuitable for traditional inspections**

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4. Enforcement Activities

Provide the reporting data as suggested in the following tables.

**The City of Downey has not identified the 2001 MS4 Permit section containing this requirement
See Section F 13 for an illicit discharge enforcement summary.**

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)

Facilities by category	Number of Warning letters	Number of NOV's	Number of Referral	Number of Other
Comments/Explanation/Conclusion:				

5. Program Implementation Effectiveness Assessment

Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activities must be reflected in a change in the SQMP, if warranted.

Highly Effective ☐

Somewhat Effective ☒

Non-effective ☐

Comments/Explanation/Conclusion:

Facilities identified through the State Monitoring Program as having excessively contaminated discharges, should be further regulated by the Water Board. The Board should convert its listing to NAICS codes. The Water Board should identify scofflaws that have not obtained a General Industrial Activities Stormwater Permit. The State should share the GIASP fees they collect with the municipalities to fund this program. The regulatory agencies should conduct more GIASP inspections and include City representatives to facilitate their training. The State should verify through sampling how the GIASP has reduced pollutant discharges from these facilities. The Water Board should develop, coordinate and enforce a County wide database of contractors and builders that move from city to city using unacceptable water quality discharge practices. The City of Downey has copied the Board on many of our NOV letters to these firms.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.

The City of Downey has not identified the MS4 Permit section containing this requirement.

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Yes ☒ No ☐
Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. **Few, if any, environmental documents were finalized in the last year. For past projects, please visit the City Website at http://www.downeyca.org/gov/cd/planning/special_zoning/default.asp for updates and planning documents.**
2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
 - a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes ☒ No ☐
 - b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes ☒ No ☐
 - c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes ☒ No ☐
 - d) Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes ☒ No ☐
3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

Downey SUSMP redevelopment project BMPs are infiltration based. This is accomplished using devices including, infiltration basins, perforated pipe in rock filled trenches, open and closed rock filled trenches, Cultec®, Rainstore3®, and Stormtech® units. Over 1,000 priority and non-priority projects with infiltration devices have been permitted by the City of Downey over the life of the 2001 MS4 Permit.

4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

None of the permit identified Natural Drainage Systems are in, or downstream, from the City of Downey. During development planning, the City of Downey attempts to limit peak runoff flows to approximate those, which the sites produced before the redevelopment effort.

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5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes ☒ No ☐

6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

Projects requiring a Conditional Use Permit (CUP), or being referred to the Design Review Committee, are referred to the Engineering Department for development of DPW Conditions for approval including SUSMP and MS4 Permit NPDES requirements. During 2010, SUSMP reviews were undertaken by a Contractor (Interwest), but SUSMP review returned to Engineering sometime in 2011.

7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?

a)	Residential	0
b)	Commercial	1
c)	Industrial	1
d)	Automotive Service Facilities	0
e)	Retail Gasoline Outlets	0
f)	Restaurants	1
g)	Parking Lots	0
h)	Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area	0
i)	Total number of permits issued to priority projects	3

8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? **100%**
9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

This was implemented in 2003. It was a simple change in criteria.

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? 0
11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes ☐ No ☒
12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes ☒ No ☐
If no, provide an explanation and an expected date of completion.

Not applicable, see the City of Downey 2005 Annual Report.

13. Did your agency update any of the following General Plan elements in the past year?
- a) Land Use Yes ☐ No ☒
- b) Housing Yes ☐ No ☒
- c) Conservation Yes ☐ No ☒
- d) Open Space Yes ☐ No ☒
- If yes, please describe how watershed and storm water quality and quantity management considerations were included.

The City of Downey General Plan Annual Progress Report is posted on the city website at: http://www.downeyca.org/gov/cd/planning/annual_report/default.asp

14. How many targeted staff were trained last year? 0
15. How many targeted staff are trained annually? 0
16. What percentage of total staff are trained annually? 0%
17. Has your agency developed and made available development planning guidelines? Yes ☒ No ☐
18. If no, what is the expected date that guidelines will be developed and available to developers? Completed
19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

The unapproved Los Angeles County Department of Public Work Technical Best Management Practice is no longer available on the Board Website at: ftp://swrcb2a.swrcb.ca.gov/pub/rwqcb4/Stormwater/Draft_Technical_Manual/

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D. Development Construction Program

1. Describe your agency's program to control runoff from construction activity at all construction sites within its jurisdiction.

Redevelopment plans include construction waste prohibitions and a owner/developer signature line. SUSMP and GCASP are used to educate developers about controlling runoff from construction sites. BMPs for all construction sites over 1 acre include GCASP and erosion control plans. Building & Safety Inspectors, Public Works Inspectors and the Stormwater Coordinator all educate contractors before runoff becomes a problem. When rain is predicted or falls, we then remind the foreman of their responsibilities, after which either Code Enforcement or the Stormwater Coordinator may take further action in response to continued noncompliance.

2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria? **No LSWPPP**

- a) Will result in soil disturbance of one acre or greater Yes ☐ No ☒
- b) Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area Yes ☐ No ☒
- c) Is located in a hillside area Yes ☐ No ☒

3. Attach one example of a local SWPPP **No LSWPPP**

4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

When a grading plan is filed for projects 1 acre or larger, they must include a WDID to be approved. In some cases we will conditionally accept a copy of the signed NOI with verification of mailing, so that progress is not held up due to Board processing delays.

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5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? **0, No L-SWPPP**
6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? **1**
7. How many building/grading permits were issued to construction site less than one acre in size last year? **Not reported by B&S**
8. How many construction sites were inspected during the last wet season? **Not reported by B&S**
9. Complete the table below.

Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	4	<1%	4	3
Off-site discharge of other pollutants	1	<1%	1	0
No or inadequate SWPPP	2	<1%	2	0
Inadequate BMP/SWPPP implementation	2	<1%	2	0

10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

Typically Building and Safety or Public Works Inspectors see site violations while performing their normal duties. They normally respond with public education efforts. If corrections are not made, either the Stormwater Coordinator or Code Enforcement is directed to the site. Violations that are called in by the public go directly to the Stormwater Coordinator/Water Resources Control Specialist or Code Enforcement Office depending on type and staff availability.

11. Describe the system that your agency uses to track the issuance of grading permits.

Grading permits are reviewed and approved by Engineering. Questions regarding SUSMP or GCASP compliance may be referred to the Stormwater Coordinator Water Resources Control Specialist.

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E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention
(only applicable to agencies that own and/or operate a sanitary sewer system)
- a) Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes ☒ No ☐
- b) How many sanitary sewer overflows occurred within your jurisdiction? **See CIWQS**
- c) How many did your agency respond to? **See CIWQS**
- d) Did your agency investigate all complaints received? Yes ☒ No ☐
- e) How many complaints were received? **7 (SSO)**
- f) Upon notification, did your agency immediately respond to overflows by containment? Yes ☒ No ☐
- g) Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes ☒ No ☐
- h) Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes ☒ No ☐

If so, describe the program:

Information about the recently adopted SSMP is available at
<http://www.downeyca.org/blobcache/0000/0003/3371.pdf>

- i) Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4? Yes ☒ No ☐

If so, describe the program:

Information about the recently adopted SSMP is available at
<http://www.downeyca.org/blobcache/0000/0003/3371.pdf>

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2. Public Construction Activities Management

- a) What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit ? **100** %

- b) Give an explanation for any sites greater than 5 acres that were not covered:

All projects over 1 acre were covered under the GCASP.

- c) What is the total number of active public construction sites? **1 city**
How many were 5 acres or greater in size? **0 city**
- d) (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? Yes ☒ No ☐

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

- a) Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes ☒ No ☐

The Utility and Maintenance Service Yards SWPPPs have been previously implemented as reported in prior annual reports.

- b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:
- (1) Good housekeeping practices
 - (2) Material storage control
 - (3) Vehicle leaks and spill control
 - (4) Illicit discharge control

City maintenance staff adheres to a clean working area policy within the yard facilities. Paint and toxics are stored indoors or under cover to prevent rainwater exposure. Vehicles are promptly maintained, or kept in the garage bays to minimize oil and grease leakage. On-site clarifiers are cleaned on a quarterly schedule or sooner if needed.

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- c) Are all Permittee owned and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes ☒ No ☐
If not, what is the status of implementing this requirement?

The City of Downey Maintenance Yard wash area was connected to the sanitary sewer in 2006.

- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above? **Proposed, but the project is on hold until the economy improves.**

4. Landscape and Recreational Facilities Management

- a) Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers? Yes ☒ No ☐
Briefly describe this protocol:

Supervisory Maintenance Staff, whom are aware of the limitations on their applications and minimize their use, must authorize the application of horticultural pesticides and fertilizers. The pesticides are kept in a secured area to limit accessibility. The City Maintenance workers are proficient in integrated pest management strategies and graduated pest control methods to avoid the use of recalcitrant pesticides.

- b) How does your agency ensure that there is no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?

Maintenance workers limit accessibility and must authorize the application of pesticides and fertilizers. These individuals are familiar with the City MS4 Permit program and aware that rain is a pre-emptive event for nutrient or pesticide application. Only qualified staff is authorized to use pesticides/herbicides.

- c) Are any banned pesticides, herbicides, fungicides, or rodenticides stored or applied in your agency's jurisdiction that you know of? Yes ☐ No ☒
If so, list them:

The City of Downey has conveyed all known banned pesticides stocks to hazardous waste disposal facilities.

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- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? **100%**
- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

The City of Downey Maintenance Superintendent and arborist are experienced in the use of xeriscape planting. Drought tolerant plantings have been used at many City sites. Wood chips are commonly used to control weed growth, limit pest movement and retain moisture.

5. Storm Drain Operation and Management

- a) Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes ☒ No ☐
- b) How many of each designation exist in your jurisdiction?
- Priority A:
Priority B:
Priority C: 100
- c) Is your city subject to a trash TMDL? Yes ☒ No ☐
- d) If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.

In the Fall of 2009, the Gateway Cities Region Integrated Regional Water Management Joint Powers Authority (GC IRWM JPA) received a \$13M SRF loan to install CPS and/or ARS in GC catch basins. The contract is being completed and we anticipate the Downey catch basins will be completed in mid 2011. We continue to participate in Heal the Bay Coastal Clean ups as an inland site.

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- e) How many times were all Priority A basins cleaned last year? 0
- f) How many times were all Priority B basins cleaned last year? 0
- g) How many times were all Priority C basins cleaned last year? 0
- h) How much total waste was collected in tons from catch basin clean-outs last year? **See combined report in question "r".**
- i) Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year. **These lists are not currently linked, ownership of many basins are in dispute and this request does not appear to part of our MS4 permit requirements.**
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes ☒ No ☐
- k) How many new trash receptacles were installed last year? **None (installed previously). Recently DPW discovered that Bus Service added new stops without notice. Inventory and replacement is planned.**
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
- (1) Provide for the proper management of trash and litter generated from the event? Yes ☒ No ☐
 - (2) Arrange for temporary screens to be placed on catch basins? Yes ☒ No ☐
 - (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes ☒ No ☐
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes ☐ No ☒
 What percentage of stencils were legible? **N/A**

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- n) Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes ☒ No ☐
- o) Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes ☒ No ☐
Is the prioritization attached? Yes ☐ No ☒
- p) Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes ☒ No ☐
What changes have been made?

The City of Downey assesses new BMPs for application at sites around the City. We have continued to investigate new alternatives and encourage staff to suggest new opportunities where BMPs can be incorporated into public and private sector activities. We are investigating other inlet protections

- q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? Yes ☒ No ☐
- r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

Most of the channels are nearly dry when they are cleaned. The appropriate use of shovels buckets, vacuum street cleaners allowed us to remove debris (mostly vegetation, not contaminants). In addition the City of Downey removed debris from drainage "slots" (low flow channels that cross intersections) and culverts (as example between a cul-de-sac and street) and catch basins. In total 7 tons of debris were reported to have been removed from city drainage facilities.

- s) Where is removed material disposed of?

The material removed from catch basins is transported to materials storage bins and then loaded into a roll off dumpster. This is taken to an appropriate materials separation facility after which the wastes are appropriately disposed or recycled. Dry well liquid wastes are drained to the sewer during dry weather when capacity issues do not exist.

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6. Streets and Roads Maintenance

- a) Did your agency designate streets and/or street segments within its jurisdiction as one of the following:
- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? Yes ☐ No ☒
 - (2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes ☐ No ☒
 - (3) Priority C – streets and/or street segments that are designated as generating low volumes of trash and/or litter? Yes ☐ No ☒
- b) Did your agency perform all street sweeping in compliance with the permit and according to the following schedule:
- (1) Priority A – These streets and/or street segments shall be swept at least two times per month? Yes ☒ No ☐
 - (2) Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes ☐ No ☒
 - (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes ☐ No ☒

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- c) Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes ☒ No ☐
- d) Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes ☒ No ☐
- e) Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes ☒ No ☐
- f) Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
- (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? and Yes ☒ No ☐
- (2) Identify and select appropriate BMPs? Yes ☒ No ☐

7. Parking Facilities Management

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes ☒ No ☐
- b) Were any Permittee-owned parking lots cleaned less than once a month? Yes ☐ No ☒
How many? **N/A**

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8. Public Industrial Activities Management
- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes ☒ No ☐
- b) Does your agency serve a population of less than 100,000 people? Yes ☐ No ☒
9. Emergency Procedures
- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes ☒ No ☐
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes ☒ No ☐
10. Feasibility Study
- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes ☒ No ☐
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? **Downey cooperated with Sanitation District in Preparing/Submitting said list. We were never advised of its acceptance or adoption by the Board for implementation.** Yes ☒ No ☐

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F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.). **Illicit Connections and Discharges are prohibited. Illicit discharges are noticed and terminated. Illicit connections are recorded with the County to determine if they are undocumented, then dealt with accordingly.**
2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

The City of Downey does not permit connections to its storm drain system. The list of IC/ID events is forwarded to the County as a GIS theme in January of the year. The County Sanitation District and Nobel Systems have developed a GIS Drainage System Map for the County based partially on GIS data provided by the City of Downey.

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

Illicit discharges are terminated as quickly as possible based on the MS4 Permit and City Ordinance 1142. When a candidate illicit connection is located, we first direct the assumed owner to terminate any prohibited discharges. City Hall records are searched for information and if none are found, the Property Owner/Operator and LACDPW are contacted with a request to search their records for a permit. Once the connection is determined to be undocumented, we report the connection status to the State and work as quickly as possible to get the connection sealed or permitted. This is discussed with the Owner and other interested parties to identify the most reasonable, cost effective and minimal environmental risk alternatives.

4. Describe your record keeping system to document all illicit connections and discharges.

The City of Downey Water Resources Control Specialist is contacted regarding all serious and some minor IC/ID discharges. (Code Enforcement, Public Works, and Building & Safety Inspectors may choose to control small or intermittent discharges as a Public Education or NOV case.) A hard copy file of problem sites is kept in an active projects file. Digital reminders are maintained in Outlook appointment and email files and there are hard copy notification letters at the County and Regional Board Offices.

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5. What is the total length of open channel that your agency owns and operates? **5,000 feet**
6. What length was screened last year for illicit connections? **0 feet**
7. What is the total length of closed storm drain that your agency owns and operates? **41,018 feet**
8. What length was screened last year for illicit connections? **Spot checked**
9. Describe the method used to screen your storm drains.

The City of Downey is continuing to correct our GIS maps of the drainage system and screen them for ICs. This is primarily accomplished by looking for dry-weather discharges to the rivers and/or inspecting manholes and drains for dry-weather flows.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information).

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02	0	0	0	0	0	0	0
02/03	1	1	0	1	1	1-NOV	0
03/04	3	3	0	3	3	3-NOV	0
04/05	0	0	0	0	0	0	0
05/06	1	1	0	1	1	0	0
06/07	1 (I-105)	1	0	0	0	1	0
07/08	0	0	0	0	0	0	0
08/09	1	1	0	1	1	1	0
09/10	1	0	1	0	0	0	1 referral
10/11	0	0	0	0	0	0	0

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11. Explain any *other* actions that occurred in the last year.

It is unclear what this question refers to. The City of Downey has invested a significant and continuing effort to update and correct our GIS system drainage layer and identify ownership for the many State, County and City drainage facilities in our area.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported? **<4 hours**

a) Were all identified connections terminated within 180 days? Yes ☒ No ☐

b) If not, explain why.

No Illicit Connections were identified during this reporting period.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you database that contains this information).

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02	1	0	1	0	0	0	0
02/03	40	30	2	4	4	0	14
03/04	108	85	15	6	2	0	35
04/05	51	23	4	4	0	0	20
05/06	80	65	7	4	2	0	29
06/07	40	28	3	8	1	1	19
07/08	42	29	8	4	1	1	24
08/09	39	30	3	3	4	4	17
09/10	26	23	1	2	0	0	11
10/11	19	14	3	1	0	1	11

14. What is the average response time after an illicit discharge is reported? **<2 hours**

a) Did any response times exceed 72 hours? Yes ☐ No ☒

b) If yes, explain why.

N/A

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15. Describe your agency's spill response procedures.

The response varies depending on how the City is contacted and the nature of the "spill" event. If a public safety issue is perceived, Fire or Police are contacted, while Public Works responds for water issues and the Stormwater Program Coordinator is contacted when the MS4 system may be impacted. In general, the City Code Enforcement, Fire Safety and Public Works know each division's respective responsibilities and conducts informed transfers. When first contact staff are unavailable, message are left and the initial point of contact assumes immediate responsibility until the nature of the problem is clarified or the responsible contact located.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

Given available funding limitations we have no recommendations to improve the IC/ID Elimination Program. The most effective correction that could occur would be for the LARWQCB to take responsibilities for repetitive sources that move between cities. As an example we had challenges with the first 2 McDonald's remodel projects and twice with J's Gunite. In each of these cases the Regional Board was notified in writing regarding the repeated violations. However both of these dischargers do the bulk of their businesses in cities other than Downey. The Board should initiate a Permit area wide effort to control these interagency sources.

17. Attach a list of all permitted connections to your storm sewer system.
City of Downey staff are unaware of any permitted connections to our drainage system that are not city owned (and not permitted).

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V. Monitoring

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2.

VI. Assessment of Program Effectiveness

- A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:
 - 1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
 - 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
 - 3. A summary of the strengths and weaknesses of your agency's storm water management program;
 - 4. A list of specific program highlights and accomplishments;
 - 5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
 - 6. Interagency coordination between cities to improve the storm water management program;
 - 7. Future plans to improve your agency's storm water management program; and
 - 8. Suggestions to improve the effectiveness of your program or the County model programs.
- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.
- C. List any suggestions your agency has for improving program reporting and assessment.

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VII. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility, of a fine and imprisonment for knowing violations.

Executed on the 18th day of August 2011,

at the City of Downey.

Printed Name Gerald E. Greene Title Principal Civil Engineer.

(Signature) 

Signature by duly authorized representative